## PRIVACY POLICY AND TERMS OF USE

# PRIVACY POLICY

PakGreen Group Ltd uses and protects is registered as a Limited company. This privacy policy explains how we use any personal information we collect about you.

#### Introduction

This privacy notice provides you with details of how we collect and process your personal data through your use of the website <a href="https://www.pakgreen.co">www.pakgreen.co</a>, including any information you may provide through the site when you purchase or order a product or service, sign up to our newsletter or take part in a prize draw or competition.

By providing us with your data, you warrant to us that you are over 13 years of age.

#### **Contact Details**

Our full details are:

Full name of legal entity: PAKGREEN GROUP LTD

Registered in England and Wales under company number

Email address: info@pakgreen.co

Postal address: Lansdowne House 57 Berkely Square London W1J 6ER UK

Telephone number: 020 7290 9552

PakGreen is dedicated to protecting the confidentiality and privacy of information entrusted to it as part of our GDPR policy and procedure. We committed to the appropriate protection and use of personal information that has been collected online. Our intent is to collect only the personal information that is provided voluntarily by online visitors so that we can offer the right information and/or services to those individuals or businesses.

The information contained and accessed on this site is provided by the PakGreen for general guidance and is intended to offer the user general information of interest. The information and material on the Site may not be modified, reproduced, publicly displayed, performed, distributed or used for any public or commercial purposes without explicit written permission from the appropriate content or material provider.

This privacy policy notice is for this website <a href="www.pakgreen.co">www.pakgreen.co</a>. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [Business name & other trading names].
- "you", "the user" refer to the person(s) using this website.

- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a users computer or device.

# **COOKIES POLICY**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to member needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third party website.

Some cookies are required to enjoy and use the full functionality of this website. We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

## Processing of your Personal Data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- We are registered with the ICO under the Data Protection Register, our registration number is: ( XXX )
- Lawful basis: Consent

The reason we use this basis: By entering your details into this website we infer that you have consented to us contacting you by email or telephone.

We process your information in the following ways: If you enter your details into our website we will use your information to contact you.

Data retention period: We will continue to process your information until you withdraw consent or it is determined your consent no longer exists.

Sharing your information: We do not share your information that you enter into this website with third parties without your consent.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

## Data Security and Integrity

The security of your personal data is important to us. We follow generally accepted industry standards to protect the personal data received by us. We use commercially reasonable measures to safeguard personal data, which measures are appropriate to the type of information maintained, and follow applicable laws regarding the safeguarding of any such information under our control. No method of transmission over the Internet, or method of electronic storage, can be 100% secure. Therefore, we cannot guarantee the absolute security of your personal data. The Internet by its nature is a public forum, and we encourage you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online. You are responsible for protecting your username and password from third party access, and for selecting passwords that are secure.

We ensure the security of any personal information we hold by using secure data storage and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

## Disclosure, Sharing and Transfer of Personal Information

We may share your personal data within the Chamber, affiliates, or contractors as appropriate to carry out the purposes for which the information was supplied or collected (i.e. to provide the services and products you have requested from us) or as otherwise provided in this policy. Personal data will also be shared with our third-party service providers and business partners who assist with the running of the Sites and our services and products (including hosting providers, email service providers and payment processing partners). Our third-party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, we may disclose personal data about you when we believe that such use or disclosure is reasonably appropriate to: comply with any legal or regulatory obligation; enforce the terms of our agreements; establish, exercise or defend the rights of Company, our staff, members or others; protect our rights, property, safety or vital interests, or the rights, property, safety or vital interests of our users or other third parties; and implement the purchase of all or substantially all of our assets, a merger, or other similar transaction that results in a change of control.

### **Data Retention**

We will retain personal data which we process on behalf of our customers for as long as appropriate to provide services and products to our customers in accordance with any agreement in place with our customers and for other legitimate purposes. When you contact us, we may keep a record of personal data contained in your communication to help solve any issues that you might be facing. Your personal data may be retained for as long as appropriate to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement, and for other legitimate purposes. In determining how long we will retain personal data, we will consider all relevant factors.

## Links to Third Parties, Social Media and Online Engagement

We occasionally use a variety of new technologies and social media options to communicate and interact with customers, potential customers, employees and potential employees. These sites and applications include popular social networking and media sites, open source software communities and more. To better engage the public in ongoing dialog, certain of our businesses use certain third-party platforms including, but not limited to, Facebook, Twitter, LinkedIn, Instagram, Pinterest and Google+. Third-Party Websites and Applications (TPWA) are Web-based technologies that are not exclusively operated or controlled by us. When interacting on those websites, you may reveal certain personal data to us or to third parties. Other than when used by our employees for the purpose of responding to a specific message or request, we will not use, share, or retain your personal data.

Our Sites may contain links to third party websites. These third-party websites are operated by companies that are outside of our control, and your activities at those third-party websites will be governed by the policies and practices of those third parties. Company does not in any way endorse or make any representations about such third-party websites and applications. As such, Company is not responsible for the privacy practices or content of such third-party websites and applications that are subject to their own privacy policies. If you choose to access such links, we encourage you to review all third-party site privacy policies before submitting any of your personal data.

## Your Rights

You have the right to access to that data. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. If the information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in the personal information.

Subject to certain limitations and exceptions, you have the following rights under the GDPR

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

If you are dissatisfied with this policy, have queries about our data protection procedures or wish to lodge a complaint, please contact the organisation in the first instance. Thereafter you have the right to submit a complaint to the Supervisory Authority, the Information Commissioner's Office (ICO):

The Information Commissioner's Office; Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

You can see more about these rights at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

## Email Marketing Messages and Subscription

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal date" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, by contacting the EMS provider.

Our EMS providers are Infusionsoft, Mailchimp and GoDaddy. We hold the following information about you within our EMS system;

- Email address
- Any details you share
- LP address
- Subscription time & date

### Links to Third Parties

Our Sites may contain links to third party websites. These third-party websites are operated by companies that are outside of our control, and your activities at those third-party websites will be governed by the policies and practices of those third parties. Company does not in any way endorse or make any representations about such third-party websites and applications. As such, Company is not responsible for the privacy practices or content of such third-party websites and applications that are subject to their own privacy policies. If you choose to access such links, we encourage you to review all third-party site privacy policies before submitting any of your personal data.

List of all the sites / resources that may come into contact with member / user data

#### How to Contact Us

In compliance with the Privacy and applicable data protection laws, the PakGreen commits to resolve complaints about our collection or use of your personal information. PakGreen takes its users' privacy concerns seriously and is committed to resolving privacy complaints.

If you believe that PakGreen has not complied with this Privacy Policy with respect to your personal information, or you have questions about privacy related issues or the handling of your personal information, or you are an EU individual with an inquiry or complaint regarding our Privacy Shield policy, or you wish to raise any other complaint in respect of privacy, you should first contact us at PakGreen by emailing us at info@african-chamber.com or by writing to the PakGreen Compliance and Legislative Governance (CLG) team at the following address:

#### Attn

Compliance and Legislative Governance (CLG) Office Lansdowne House 57 Berkely Square London W1J 6ER United Kingdom info@pakgreen.co